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**From:** Mia, Marcia [Mia.Marcia@epa.gov]  
**Sent:** 1/16/2018 4:02:53 PM  
**To:** Cheever, Robert [cheever.robert@epa.gov]; Thompson, Lisa [Thompson.Lisa@epa.gov]  
**Subject:** RE: OOOOa Question

Hi Bob,

Lisa and I discussed.

The GP table to OOOOa (Table 3) says 60.14 applies unless OOOOa says something different - for storage there is nothing different for modification, so GP prevails on this one - see 60.14(e)(6).

That said, the 60.14(e) are "alone" changes, which means that if all they do is move it, it doesn't trigger modification. Any other changes which might trigger modification or reconstruction would have to be evaluated.

Marcia B Mia, Acting Chief  
Air Branch  
Office of Compliance  
2227A WJCS  
U.S. Environmental Protection Agency  
202-564-7042

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**From:** Cheever, Robert  
**Sent:** Tuesday, January 16, 2018 9:20 AM  
**To:** Thompson, Lisa ; Mia, Marcia  
**Subject:** FW: OOOOa Question

Lisa / Marcia,

I know there is a lot going on; but really would like your input on what our response to Kansas should be!

Thanks,

R. L. (Bob) Cheever  
Environmental Engineer  
Air Permitting and Compliance Branch  
Air & Waste Management Division  
U.S. EPA, Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

913-551-7980  
[cheever.robert@epa.gov](mailto:cheever.robert@epa.gov)

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**From:** Cheever, Robert  
**Sent:** Tuesday, January 09, 2018 10:32 AM  
**To:** Thompson, Lisa <[Thompson.Lisa@epa.gov](mailto:Thompson.Lisa@epa.gov)>  
**Subject:** RE: OOOOa Question

Lisa,

Any further updates toward a response?

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**From:** Thompson, Lisa  
**Sent:** Wednesday, December 20, 2017 8:57 AM  
**To:** Cheever, Robert <[cheever.robert@epa.gov](mailto:cheever.robert@epa.gov)>  
**Subject:** RE: OOOOa Question

Hi Bob - I'm running this by Karen Marsh and Marcia Mia - I'll get back to you shortly. It may be after the holidays depending on Marcia's vacation schedule..

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**From:** Cheever, Robert  
**Sent:** Tuesday, December 19, 2017 2:45 PM  
**To:** Thompson, Lisa <[Thompson.Lisa@epa.gov](mailto:Thompson.Lisa@epa.gov)>  
**Subject:** OOOOa Question

Lisa,

I'm not sure if you are the right person to contact regarding the following question, but am hoping you can pass this along if you are not the one.

The question is:

If I have a facility that is looking to relocate two fiberglass oil/condensate tanks and an oil/water separate from an abandoned facility to another permitted compressor station does this relocation trigger requirements under NSPS OOOOa. A review of both the regulation and the ADI shows there are several determinations in the ADI for other NSPS regulations that said relocation does not trigger construction, reconstruction, or modification. However, I wanted to confirm this would apply to NSPS OOOOa as well.

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